

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:)	Chapter 11 Case No. 20-10334 TPA
)	Related to Document Nos. 306, 303, 302, and 294
JOSEPH MARTIN THOMAS,)	
Debtor.)	

In re:)	Chapter 11 Case No. 21-10118 TPA
)	Related to Document Nos. 53, 50, 49, and 28
2374 VILLAGE COMMON DRIVE, LLC,)	
Debtor.)	

JOSEPH MARTIN THOMAS, and 2374
VILLAGE COMMON DRIVE, LLC,
Movants,

vs.

WELLS FARGO BANK, NATIONAL
ASSOCIATION; UNITED STATES OF
AMERICA, SMALL BUSINESS
ADMINISTRATION; ERIE COUNTY TAX
CLAIM BUREAU; MILLCREEK TOWNSHIP
TAX COLLECTOR; UNITED STATES OF
AMERICA, INTERNAL REVENUE SERVICE;
COMMONWEALTH OF PENNSYLVANIA,
DEPARTMENT OF REVENUE; TIAA
COMMERCIAL FINANCE, INC.;
NORTHWEST SAVINGS BANK, now known as
NORTHWEST BANK; CORE ERIE MOB, L.P.;
and JOSEPH C. KRAMER,
Respondents.

**JOINT MOTION FOR APPROVING
BIDDING PROCEDURES**

DATE AND TIME OF HEARING:
March 25, 2021 @ 10:00 a.m.

RESPONSE DEADLINE:
March 24, 2021 by Noon

**JOINT MOTION FOR ORDER APPROVING
SALE OF REAL ESTATE:**

DATE AND TIME OF HEARING:
April 28, 2021 @ 11:00 a.m.

RESPONSE DEADLINE:
April 21, 2021

CERTIFICATE OF SERVICE

I, the undersigned, certify that I served, or caused to be served, on the 16TH day of March, 2021, a copy of the *1) Joint Motion for Order Approving Sale of Real Estate Free and Divested of Liens; 2) Order Scheduling Date for Response and Hearing on Motion; 3) Order dated March 12, 2021, and 4) Notice of Bid Procedures, Auction and Sale Hearing Date, and Deadline to Object to Sale Motion* upon each of the following persons and parties in interest at the address shown on the attached list.

Respectfully submitted,

THE QUINN LAW FIRM

BY: /s/Michael P. Kruszewski

Michael P. Kruszewski, Esquire
PA Id. No. 91239
2222 West Grandview Boulevard
Erie, Pennsylvania 16506-4508
Telephone: 814-833-2222
Facsimile: 814-833-6753
E-Mail Address: mkruszewski@quinnfirm.com
Counsel for Debtors

The following parties were served via the CM/ECF System and will not receive a paper copy of the filing:

Joseph Martin Thomas
Case No. 20-10334
Service List

The following parties received notification via the CM/ECF System and will not receive a paper copy of the filing:

Office of the United States Trustee; ustpreion03.pi.ecf@usdoj.gov
Michael F.J. Romano, Esquire (TIAA Commercial Finance, Inc.); mromano@rgalegal.com
Norma Hildenbrand, Esquire (Office of the U.S. Trustee); Norma.L.Hildenbrand@usdoj.gov
Guy C. Fustine (Official Committee of Unsecured Creditors/Tri-State Pain Institute LLC); mwernick@kmgslaw.com
Salene R.M. Kraemer, Esquire (Wells Fargo Bank, N.A.) skraemer@bernsteinlaw.com
Lauren Michaels, Esquire (Pa. Dept. of Revenue) lmichaels@attorneygeneral.gov
Gary V. Skiba, Esquire (Tri-State Pain Institute LLC) gskiba@marshlaw.com
Mark G. Claypool, Esquire (Ally Bank) mclaypool@kmgslaw.com
Crystal H. Thornton-Illar (The Kada Gallery) cThornton-Illar@leechtishman.com
Brian Nicholas, Esquire (PNC Bank National Association) bnicholas@kmlawgroup.com
Ronald B. Roteman, Esquire (Kay B. and Steven E. Ribbing) roteman@stonecipherlaw.com

2374 Village Common Drive LLC
Case No. 21-10118 TPA
Service List

The following parties received notice via the CM/ECF System and will not receive a paper copy of the filing:

Office of the U.S. Trustee: ustpreion03.pi.ecf@usdoj.gov
Norma Hildenbrand, Esquire, Office of the U.S. Trustee: Norma.L.Hildenbrand@usdoj.gov
Salene R.M. Kraemer, Esquire, Wells Fargo Bank, N.A.: skraemer@bernsteinlaw.com
Michael F.J. Romano, Esquire, TIAA Commercial Finance, Inc.: mromano@rgalegal.com

The following parties were served via First Class Mail, Postage Pre-Paid:

Office of the United States Trustee Liberty Center 1001 Liberty Avenue, Suite 970 Pittsburgh, PA 15222	Wells Fargo Bank, N.A. c/of Steven Treadway 1620 Roseville Parkway, 1st Floor Suite 100, MAC AI792-018 Roseville, CA 95661
Wells Fargo Bank, National Association 4101 Wiseman Blvd. Building 307 San Antonio, TX 78251	Salene Mazur Kraemer, Esquire Bernstein-Burkley PC 707 Grant Street, Suite 2200 Gulf Tower Pittsburgh, PA 15219
United States of America Small Business Administration 660 American Avenue, Suite 301 King of Prussia, PA 19406	Anthony K. Arroyo, Esquire District Counsel, Small Business Administration 660 American Avenue Suite 301 King of Prussia, PA 19406
Tami Perriello, Acting SBA Administrator U.S. Small Business Administration 409 Third Street SW Washington, DC 20024	Major Clark, Acting Chief Counsel U.S. Small Business Administration 409 Third Street SW Washington, DC 20024

Peggy Delinois Hamilton, General Counsel Office of General Counsel U.S. Small Business Administration 409 Third Street SW Washington, DC 20024	Nina Levine Deputy General Counsel U.S. Small Business Administration 409 Third Street SW Washington, DC 20024
Attorney General of the United States U.S. Dept. of Justice 950 Pennsylvania Avenue, NW Washington, D.C. 20530	United States Attorney's Office Western District of Pennsylvania ATTENTION: Civil Process Clerk Joseph F. Weis, Jr. U.S. Courthouse 700 Grant Street Suite 4000 Pittsburgh, PA 15219
United States Attorney's Office Western District of Pennsylvania ATTENTION: Civil Process Clerk 17 South Park Road, Suite A330 Erie, PA 16501	Stephen R. Kaufman, Esquire Acting U.S. Attorney for the Western District of PA Joseph F. Weis, Jr. U.S. Courthouse 700 Grant Street, Suite 4000 Pittsburgh, PA 15219
Internal Revenue Service ATTENTION: Centralized Insolvency Operations P.O. Box 7346 Philadelphia, PA 19101-7346	Internal Revenue Service 1000 Liberty Avenue Stop 711B Pittsburgh, PA 15222-3714
United States Internal Revenue Service Special Procedures Division P.O. Box 628 Bankruptcy Section Pittsburgh, PA 15230	Jill L. Locnikar, Esquire U.S. Attorney's Office 700 Grant Street, Suite 4000 Pittsburgh, PA 15219
Pa. Dept. of Revenue Bankruptcy Division P.O. Box 280946 Harrisburg, PA 17128-0946	Pa. Dept. of Revenue 4th & Walnut Street Harrisburg, PA 17128
Attorney General of Pennsylvania Western Regional Office 1251 Waterfront Place Mezzanine Level Pittsburgh, PA 15222	Erie County Tax Claim Bureau Erie County Courthouse 140 West Sixth Street, Room 110 Erie, PA 16501
Millcreek Township Tax Collector 3608 West 26th Street Erie, PA 16506	Coldwell Banker Select, REALTORS ATTENTION: Mark Hutchison and William Bucceri 2601 West 26th Street Erie, PA 16506
Core Erie MOB, L.P. 1515 Lake Shore Drive Suite 225 Columbus, OH 43204	Northwest Savings Bank, now Northwest Bank 100 Liberty Street Drawer 128 Warren, PA 16365-0128
Joseph C. Kramer P.O. Box 8263 Erie, PA 16505	Sherry Bauer Sherry Bauer Real Estate Services 1315 Peninsula Drive Erie, PA 16505

TIAA Commercial Finance, Inc. 390 S. Woods Mill Road, Suite 300 Chesterfield, MO 63017	Michael F.J. Romana, Esquire Ramano, Garubo, & Argentieri P.O. Box 456 52 Newton Avenue Woodbury, NJ 08096
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Please note that complete copies of the Joint Motion for Order Approving Bidding Procedures and Notice and Order Setting Hearing on an Expedited Basis were previously served on all necessary parties and Certificates of Service were filed on March 12, 2021.